

BEFORE THE  
POSTAL RATE COMMISSION  
WASHINGTON DC 20268-0001

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POSTAL RATE COMMISSION  
OFFICE OF THE SECRETARY

Complaint on Sunday  
and Holiday Collections

Docket No. C2001-1

DAVID B. POPKIN  
INTERROGATORIES TO THE UNITED STATES POSTAL SERVICE  
[DBP/USPS-1-12]

May 29, 2001

Pursuant to POR C2001-1/1, I hereby submit interrogatories to the United States Postal Service. The instructions contained in the interrogatories DFC/USPS-1-18 dated May 19, 2001, are incorporated herein by reference.

Respectfully submitted,



May 29, 2001

David B. Popkin, PO Box 528, Englewood, NJ 07631-0528

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DBP/USPS-1 [a] Confirm that Exhibit 125.22 of the Postal Operations Manual [POM] - Issue 8 dated July 18, 1998 and Exhibit 1.5 of Section G011.1.5 of the Domestic Mail Manual [DMM] - Issue 56 dated January 7, 2001 are both utilized to provide Holiday Service Levels to members of the public as well as postal employees. [b] Confirm that the Definition of Terms for Holiday and Sunday contained in the DMM Exhibit also apply to the POM Exhibit. [c] Confirm that the approving authority for exceptions to the service levels differs between the POM and DMM Exhibits. [d] Provide any other differences that exist between the POM and DMM Exhibits and advise which Exhibit is correct. [e] Please explain and discuss any items that you are not able to confirm.

DBP/USPS-2 For the period of 1987 to date, please provide a complete listing of any exceptions to the holiday service levels that were approved by a District Manager as noted in the Note following Section B of Exhibit 1.5 in the DMM.

DBP/USPS-3 For the period of 1987 to date, please provide a complete listing of any exceptions to the holiday service levels that were approved by the Chief Operating Officer and Executive Vice President as noted in the Note following Section B of Exhibit 125.22 in the POM.

DBP/USPS-4 Based on the discrepancy between the POM and DMM Exhibits, please advise the current Postal Service policy as to the level of approval that is required to approve any exceptions to the holiday service levels.

DBP/USPS-5 With the exception of the discrepancy noted in DBP/USPS-4, provide any other data contained in these Exhibits that does not represent current Postal Service policy and advise the level of service mandated by the current policy.

DBP/USPS-6 Does the Postal Service plan to change these Exhibits to match current Postal Service policy? If so, please advise when it will be accomplished by. If not, please explain why not.

DBP/USPS-7 Please advise the publicity provided to the mailing public to advise them of any exceptions to the holiday service levels as noted in responses to DBP/USPS 2 and 3.

DBP/USPS-8 [a] Please confirm that it is the policy of the Postal Service to eliminate or reduce retail window service on days shortly before or after a holiday as compared to a similar day of the week not related to the holiday period. [b] Please provide all documents [for the period from 1987 to date] stating Postal Service policy, guidance, or recommendations for deciding, or establishing criteria for deciding, the elimination or reduction of retail window service on days shortly before or after a holiday. [c] Please advise the publicity provided to the mailing public to advise them of the elimination or reduction of retail window service. [d] Please explain and discuss any items that you are not able to confirm.

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DBP/USPS-9 Please confirm, or explain if you are unable to do so, that elimination or reduction of retail window service on days shortly before or after a holiday as compared to a similar day of the week not related to the holiday period will reduce the ability of the mailing public to enter mail into the system during that period.

DBP/USPS-10 Please refer to Interrogatory DFC/USPS-3 relating to documents that guide field offices on the proper circumstances under which holiday collection times should be posted on collection boxes. Please provide copies of all documents issued by any Area or District office during the period of 1987 to date. If you do not provide Mr. Carlson with headquarters directives for the period of 1987 to date, please provide them to me.

DBP/USPS-11 Please provide copies of all documents issued by the Postal Service during the period of 1987 to date providing direction to the field requiring collections are made on holidays from collection boxes that are not marked with a collection time for holidays.

DBP/USPS-12 Please provide copies of all documents issued by the Postal Service during the period of 1987 to date providing direction to the field requiring that collections are not made on certain holidays from collection boxes even though the boxes are marked with a collection time for holidays.

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#### CERTIFICATE OF SERVICE

I hereby certify that I have this day served the foregoing document upon the required participants of record in accordance with Rule 12.

May 29, 2001

  
David B. Popkin